

1 HONORABLE JOHN C. COUGHENOUR  
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11 **UNITED STATES DISTRICT COURT**  
12 **WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

13 LANCE P. MCDERMOTT,  
14 Plaintiff, *Pro Se*,

15 v.

16 U.S. POSTAL SERVICE (USPS), Postmaster  
17 General, MEGAN BRENNAN, *Et Al.*;

18 and

19 GREATER SEATTLE AREA LOCAL (GSAL),  
20 AMERICAN POSTAL WORKERS UNION  
21 (APWU), AFL-CIO, PRESIDENT, MYRNA  
22 UMALI; *Et Al.*, SALARIED UNION  
23 OFFICIALS,

24 Defendants.

25 No. 16-cv-00377-JCC

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10 **DECLARATION OF DANIEL  
11 CAIRNS IN SUPPORT OF UNION  
12 DEFENDANTS' MOTION TO  
13 DISMISS**

14 I, Daniel Cairns, state as follows:

15 1. I am an attorney licensed to practice in the United States District Court for the  
16 Western District of Washington. I represent defendants Greater Seattle Area Local ("GSAL"),  
17 American Postal Workers Union ("APWU"), AFL-CIO, President Myrna Umali, and, Salaried  
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19 DECLARATION OF DANIEL CAIRNS IN  
20 SUPPORT OF UNION DEFENDANTS'  
21 MOTION TO DISMISS  
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ROBBLEE DETWILER & BLACK  
ATTORNEYS at LAW  
2101 FOURTH AVENUE, SUITE 1000  
SEATTLE, WA 98121-2392  
(206) 467-6700 · (206) 467-7589 facsimile

1 Union Officials (collectively "Union Defendants") in this matter. As such, I am familiar with the  
2 files and records in this case.

3 2. Attached to this declaration as Exhibit A is a true and correct copy of Plaintiff's  
4 complaint (Dkt. #1), filed on June 30, 2015, in McDermott v. Brennan, 15-CV-01069-RAJ  
5 (W.D. Wash.) ("2015 Action").

6 3. Attached to this declaration as Exhibit B is a true and correct copy of Plaintiff's  
7 reply to the Union Defendants' motion to dismiss (Dkt. #11) in the 2015 Action.

8 4. Attached to this declaration as Exhibit C is a true and correct copy of the court's  
9 order (Dkt. #21), dated February 23, 2016, granting Union Defendants' motion to dismiss in the  
10 2015 Action.

11 I declare under penalty of perjury that the foregoing is true and correct.  
12

13 Executed this 14th day of April, 2016, in Seattle, Washington.

14   
15 Daniel S. S. Cairns, WSBA No. 49950  
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18 Seattle, Washington 98121  
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24 Attorneys for Union Defendants

25 DECLARATION OF DANIEL CAIRNS IN  
SUPPORT OF UNION DEFENDANTS'  
MOTION TO DISMISS  
16-cv-00377-JCC - 2

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**CERTIFICATE OF SERVICE**

2 I hereby certify that on April 14, 2016, I electronically filed the foregoing  
3 **DECLARATION OF DANIEL CAIRNS IN SUPPORT OF UNION DEFENDANTS'**  
4 **MOTION TO DISMISS** with the Clerk of the Court using the CM/ECF system which will send  
5 notification of such filing to the following:

6  
7 Lance McDermott  
8 1819 S 104 Street  
9 Seattle, Washington 98168  
E-mail: treke@hotmail.com

10 s/ Kristina Detwiler  
11 Kristina Detwiler, WSBA No. 26448  
12 Robblee Detwiler & Black, PLLP  
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15 Attorneys for Union Defendants

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CERTIFICATE OF SERVICE - 1

LAW OFFICES OF  
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